

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

ROSEMARIE E. WADDY,	)	
	)	
Plaintiff,	)	Cause No.: 4-22-cv-2
	)	
v.	)	
	)	
HIGHLAND VENTURES, LTD.	)	
d/b/a FAMILY VIDEO,	)	
	)	
and	)	
	)	
KEITH HOOGLAND LIMITED	)	
PARTNERSHIP,	)	
	)	
Defendants.	)	

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**IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS  
STATE OF MISSOURI**

ROSEMARIE E. WADDY,	)	
	)	
Plaintiff,	)	Cause No.: 2122-CC09764
	)	
v.	)	Division:
	)	
HIGHLAND VENTURES, LTD.	)	
d/b/a FAMILY VIDEO,	)	
	)	
and	)	
	)	
KEITH HOOGLAND LIMITED	)	
PARTNERSHIP,	)	
	)	
Defendants.	)	

**NOTICE OF REMOVAL**

COMES NOW Defendant Highland Ventures, Ltd., et al., by and through counsel, and pursuant to 28 U.S.C. §1446, respectfully represents to the Court as follows for its Notice of Removal:

1. Defendant Highland Ventures, Ltd., et al. is an Illinois corporation with its principal place of business in Glenview, Illinois. See, Affidavit of Veronica Duda, attached hereto as Exhibit 1 and Paragraph 2 of Plaintiff's Petition attached hereto as Exhibit 3.

2. Defendant Keith Hoogland Limited Partnership is organized under the laws of the State of Illinois with its principal place of business in Glenview, Illinois. It does not have a partner who resides in or is a citizen of the State of Missouri. Further, Keith Hoogland Limited Partnership consents to the removal. See, Affidavit of Veronica Duda, attached hereto as Exhibit 2 and paragraph 3 of Plaintiff's Petition attached hereto as Exhibit 3.

3. Plaintiff is a citizen and resident of St. Louis, Missouri. See, Plaintiff's Petition at paragraph 1, attached hereto as Exhibit 3.

4. Defendant Highland Ventures, Ltd., at the time of filing this Notice, as well as at the time of the filing of this case and at the time it became removable, and at all times mentioned herein, is and was a citizen and resident of the State of Illinois. See, Affidavit of Veronica Duda, attached hereto as Exhibit 1. The other defendant named in Plaintiff's Petition, Keith Hoogland Limited Partnership is a resident of the State of Illinois. See, Affidavit of Veronica Duda, attached hereto as Exhibit 2 and paragraph 3 of Plaintiff's Petition attached hereto as Exhibit 3. Plaintiff is a citizen and resident of the State of Missouri, and therefore diversity of citizenship exists between plaintiff and all defendants.

5. Plaintiff has filed suit in the Circuit Court of the City of St. Louis, State of Missouri, against Defendants Highland Ventures, Ltd. and Keith Hoogland Limited Partnership. Said suit bearing Cause No. 2122-CC09764, of the Circuit Court of the City of St. Louis, State of Missouri. See, Exhibit 3, attached hereto, which consists of Plaintiff's First Amended Complaint filed in the Circuit Court for St. Louis City on November 19, 2021.

6. Plaintiff prays for damages in an amount that is fair and reasonable, and in excess of \$50,000. This defendant has a good faith reason to believe plaintiff is seeking more than \$75,000 as this is an action for personal injuries based on a fractured ankle for which she claims permanent disability and \$124,000 in medical expenses. Therefore, the jurisdiction amount for removal is met.

7. Defendant Highland Ventures, Ltd. was served with Plaintiff's Petition, on or about December 16, 2021, which is not more than 30 days prior to the filing of this Notice of Removal pursuant to 28 U.S.C. §1445(b).

8. Defendant's counsel is licensed to practice law in the State of Missouri and the United States District Court for the Eastern District of Missouri.

9. Defendant hereby requests a trial by jury on all claims.

10. Counsel for Defendant herewith attaches all pleadings filed in Case No. 2122-CC09764 pursuant to 28 U.S.C. §1446(a).

11. A substantial part of the events or omissions giving rise to Plaintiff's claim occurred in St. Louis City, Missouri. *Exhibit 3 – Plaintiff's Petition*, ¶3.

12. Venue is proper in the United States District court for the Eastern District of Missouri because a substantial part of the events or omissions giving rise to Plaintiff's claim occurred in this judicial district. 28 U.S.C. §1391.

13. Based upon the foregoing, Defendant Highland Ventures, Ltd. desires to and does herewith remove Cause No. 2122-CC09764 of the Circuit Court of the 22<sup>nd</sup> Judicial Circuit of the City of St. Louis, State of Missouri to the United States District Court for the Eastern District of Missouri for further proceedings. 28 U.S.C. § 1446.

WHEREFORE, Defendant Highland Ventures, Ltd. herewith removes the above-described case, Cause No. 2122-CC09764, of the Circuit Court of the City of St. Louis, State of Missouri,

Rosemarie E. Waddy v. Highland Ventures, Ltd. d/b/a Family Video, and Keith Hoogland Limited Partnership, to this Court for further proceedings.

**RYNEARSON, SUESS, SCHNURBUSCH  
& CHAMPION, L.L.C.**

BY: /s/ Heather J. Hays  
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**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that on this 3rd day of January, 2022, the foregoing document was electronically filed via the Court's ECF system to be served upon Justin C. Wilson/Logan Berman, Brown & Crouppen, P.C., One Metropolitan Square, 211 N. Broadway, Suite 1600, St. Louis, Missouri 63102.

/s/ Jeffrey K. Suess